

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

SINCERE TERRY, et al.

Plaintiffs,

v.

CITY OF OKLAHOMA CITY,
OKLAHOMA, et al.

Defendants.

No. 5:22-cv-00522-C

Hon. Charles B. Goodwin

DECLARATION OF SINCERE TERRY

Sincere Terry declares under penalty of perjury and pursuant to 28 U.S.C. §1746:

1. The facts set forth in this affidavit are based on my personal, first-hand knowledge.
2. I am twenty-two-year-old Black woman and a resident of Oklahoma City, Oklahoma.
3. Since filing the Amended Complaint in this action, I have not attended or organized any protests, even those I strongly felt the need to join, such as those organized in response to the murder of fifteen-year-old Stavian Rodriguez by Oklahoma City police officers, challenging the death penalty, and other protests organized by the People's

Council challenging Oklahoma City Police Department (“OCPD”) misconduct and racial justice. The fear for my safety from Oklahoma City police officers has become overwhelming.

4. I no longer attend protests or participate in any organizing activity, such as taking a leadership role or sharing my viewpoints on social media, due to fear of the OCPD harassment and surveillance.

5. I have not taken any advocacy role in support of my uncle’s unjust criminal case. Following his arrest by OCPD, the Oklahoma County District Attorney charged him with the murder of his infant son soon after his son was born, even though he was sent home sick from the hospital. Although the Department of Human Services cleared him of any wrongdoing, he faced a criminal trial in October 2023. If I were not so afraid of the targeting by OCPD officers, I would be organizing protests and speaking to the District Attorney and Governor to bring attention to the injustice of my uncle’s case.

6. I have avoided encounters with OCPD by not going out, only leaving my home for work and errands.

7. I still plan to re-enroll at the University of Central Oklahoma as a pre-law major, an interest that developed from the harm my arrests have caused me. However, due to financial constraints resulting from loss of sufficient employment, I have not been able to go back to school.

8. I still feel censored. I have developed a belief that there is really no freedom of speech in practice and that I have to watch what I say or face surveillance and harassment by OCPD.

9. If I felt safe enough to do so, I would participate in protests and criticize the OCPD just as actively as I did before.

Executed in Oklahoma this 15th day of December.

A handwritten signature in cursive script, appearing to read "Sincere Terry", written over a horizontal line.

Sincere Terry